

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13
Robert J. Waldron, Jr. :
Debtor : BANKRUPTCY NO.: 17-16763-elf

RESPONSE TO MOTION FOR RELIEF

Debtor, by his attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Motion, respectfully represents the following:

- 1-3. Admitted.
4. Neither admitted, nor denied. The facts contained in Movant's averment are on record before the Court and said information speaks for itself.
5. Denied. The averments set forth in this paragraph is denied to the extent that they contain conclusions of law to which no response is necessary.
6. Denied. The Debtor does not have the requisite knowledge to attest to the veracity of Movant's averment. Movant's averment is therefore denied.
7. Denied. The Debtor does not have the requisite knowledge to attest to the veracity of Movant's averment. Movant's averment is therefore denied.
8. The Debtor intends to cure any payments that may be due at this time.
9. Denied. The averments set forth in this Paragraph is denied to the extent that they contain conclusions of law to which no response is necessary.
10. Denied. The averments set forth in this paragraph are denied as they are conclusions of law to which no response is necessary.
11. This averment does not call for a response.
12. Denied. The averments set forth in this paragraph is denied as they are conclusions of law to which no response is necessary.
13. Denied.

WHEREFORE, Debtor pray that the Movant's request for relief be denied.

Date: May 30, 2018

/s/ Brandon J. Perloff
Brandon J. Perloff Esquire.
Attorney for Debtor